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Attorneys for Defendant
Otto Trucking LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HAYES HYDE IN
SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
RESPONSE TO OTTO TRUCKING LLC'S
REQUEST FOR PERMISSION TO FILE A
MOTION FOR SUMMARY JUDGMENT**

1 I, Hayes Hyde, declare as follows:

2 1. I am an attorney at the law firm of Goodwin Procter, LLP. I make this declaration
3 based upon matters within my own personal knowledge and if called as a witness, I could and
4 would competently testify to the matters set forth herein. I make this declaration in support of
5 Plaintiff's Administrative Motion to File Under Seal Portions of Its Response to Otto Trucking's
6 Request for Permission to File a Motion for Summary Judgment (the "Response") (Dkt. No. 752).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Response	Highlighted Portions

9
10
11 3. The highlighted portions (in blue) of the Response include highly confidential
12 information regarding business agreement terms, including information about the structure of a
13 business agreement that is not publicly known, and this information's confidentiality is strictly
14 maintained. If this information were made public, Defendant's competitors and counterparties
15 would have insight into how Defendant structures its business agreements, allowing them to
16 modify their own business strategy. Defendant's competitive standing could be significantly
17 harmed.

18 4. Defendant's request to seal is narrowly tailored to those portions of the Plaintiff's
19 Motion and its supporting papers that merit sealing.

20 I declare under penalty of perjury under the laws of the United States that the foregoing is
21 true and correct. Executed this 30th day of June, 2017 in San Francisco, California.

22
23 /s/ Hayes P. Hyde
Hayes P. Hyde

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of California by using the CM/ECF system on June 30, 2017. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct. Executed this 30th day of June 2017.

/s/ Hayes P. Hyde
Hayes P. Hyde